

**IN THE UNITED STATES BANKRUPTCY COURT FOR
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

MIDNIGHT MADNESS DISTILLING

Debtor.

Case No.: 21-11750-PMM

Chapter 7 case

BONNIE B. FINKEL, in her capacity as Chapter
7 Trustee for Midnight Madness Distilling,

Plaintiff,

Adv. Pro. No.: 23-00047-PMM

v.

CASEY PARZYCH; SHAWN SHEEHAN;
ANGUS RITTENBURG, KELLY FESTA,
ASHLEIGH BALDWIN; MICHAEL BOYER;
R.F. CULBERTSON; GARY PARZYCH; RYAN
USZESNKI; POLEBRIDGE LLC; GOOD
DESIGN, INC.; AGTECH PA LLC; AGTECH VI,
LLC; XO ENERGY WORLDWIDE LLLP; XO
EW, LLC; CAN MAN LLC; BEST BEV, LLC;
ETOH WORLDWIDE, LLC; CANVAS 340, LLC;
FINLAND LEASING CO., INC.; and EUGENE T.
PARZYCH, INC.

Defendants.

**LIMITED OBJECTION TO MOTION OF KURZMAN | STEADY, LLC FOR AN
ORDER GRANTING LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANTS
RYAN USZESNKI, CAN MAN LLC, FINLAND LEASING CO., INC. AND EUGENE G.
PARZYCH, INC.**

Defendants AgTech PA LLC; Ashleigh Baldwin; Best Bev, LLC; Michael Boyer; Canvas
340 LLC; R.F. Culbertson; Kelly Festa; Good Design, Inc.; Best Bev, LLC; Casey Parzych;
Polebridge, LLC; Angus Rittenburg; Shawn Sheehan; XO EW, LLC; and XO Energy Worldwide,
LLLP (collectively, the "**KLG Defendants**"), by and through undersigned counsel, hereby file

this limited objection (the “**Limited Objection**”) to the Motion (the “**Motion**”) of Kurtzman | Steady, LLC (the “**Movant**”) for an Order Granting Leave to Withdraw as Counsel for Defendants Gary Parzych; Ryan Uszenski; Can Man LLC; Finland Leasing Co., Inc.; and Eugene T. Parzych, Inc. (the “**Kurtzman Defendants**”).

The KLG Defendants do not take a position on the Movant’s withdrawal itself – that is between the Movant and the Kurtzman Defendants. However, the Motion states that K&L Gates LLP could assume the representation of the Kurtzman Defendants. However, none of the Kurtzman Defendants are clients of K&L Gates LLP and have not requested that K&L Gates LLP represent them. Thus, it is improper to request that the Court transfer responsibility of the Kurtzman Defendants to K&L Gates LLP.

WHEREFORE, KLG Defendants respectfully request that this Honorable Court deny the Motion to the extent it is improperly seeking to transfer unrepresented clients to K&L Gates LLP, and, if Movant is allowed to withdraw, order the Kurtzman Defendants, to the extent they cannot represent themselves pro se, to obtain counsel within the next 30 days, and any other relief the Court deems just and proper.

Dated: December 16, 2024

K&L GATES LLP

/s/ Steven L. Caponi

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Culbertson; Michael Boyer; Kelly Festa,
Polebridge, LLC; Good Design, Inc.; AgTech
PA LLC; XO Energy Worldwide, LLLP; XO
EW, LLC; Best Bev, LLC;; and Canvas 340
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Defendants.

CERTIFICATE OF SERVICE

I, Steven Caponi, hereby certify that on December 16, 2024, I served a copy of the forgoing
Limited Objection via CM/ECF on all counsel registered to receive electronic service via
CM/ECF.

/s/ Steven L. Caponi
Steven L. Caponi